IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

| In re: |) Chapter 11 |
|---|----------------------------|
| FIRST GUARANTY MORTGAGE CORPORATION, et al.,1 |) Case No. 22-10584 (CTG) |
| Debtors. |) (Jointly Administered)) |

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JUNE 30, 2023 AT 3:00 P.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CRAIG T. GOLDBLATT IN THE U.S. BANKRUPTCY COURT, 824 NORTH MARKET STREET, 3RD FLOOR, COURTROOM 7, WILMINGTON, DELAWARE 19801

This hearing will be conducted via Zoom. All participants over Zoom must register in advance. Please register by June 30, 2023 at 12:00 p.m.

COURTCALL WILL NOT BE USED FOR THIS HEARING.
Please use the following link to register for this hearing:

https://debuscourts.zoomgov.com/meeting/register/vJItdOqgpz0vGycxCX2YBjRZOlSYJ6 tWNc

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

I. <u>CONTESTED MATTERS GOING FORWARD</u>

1. *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed December 13, 2022) [Docket No. 711]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received

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¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 24, 2023) [Docket No. 762]

Related Documents

- A. Notice of Hearing on Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 10, 2023) [Docket No. 749]
- B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. 766]

Status: This matter is going forward.

2. Qui Tam Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her Qui Tam Action to the District of Delaware and to Pursue the Qui Tam Action Against the Debtor as Nominal Defendant (Filed December 13, 2022) [Docket No. 712]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received:

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. 761]
- B. Objection of B2 FIE XI LC AND LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. 763]
- C. Liquidating Trustee's Supplemental Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed June 21, 2023) [Docket No. 835]

Related Documents:

A. Notice of Hearing on *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of

Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 10, 2023) [Docket No. 750]

B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. 766]

Status: This matter is going forward.

3. Qui Tam Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her Qui Tam Action to the District of Delaware and (2) to Pursue the Qui Tam Action Solely to the Limits and Proceeds of Insurance (Filed June 15, 2023) [Docket No. 833]

Response Deadline: June 22, 2023 at 4:00 p.m. (Extended to June 23, 2023 as to the Liquidating Trustee and the Lenders)

Responses Received:

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. 843]
- B. Objection of B2FIE XI LLC and LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. 844]

Status: This matter is going forward.

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Dated: June 29, 2023 PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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